REMARKS

Claims 1-20 are pending in this application. Claims 1-3, 6, 9, 10, and 13-17 are amended and claims 21-23 are added. Claims 1-20 are rejected. Claims 1, 13, and 17 are amended to clarify that root as effective id enables reading of root-only readable files. No range of equivalents is surrendered or is intended to be surrendered by these amendments. Claims 6, 9, and 16 are amended to place them in independent form and to incorporate the features of their base claims. Claims 2, 3, 10, 12, 14, and 15 were amended solely to address an antecedent basis rejection. No range of equivalents is surrendered or is intended to be surrendered by these amendments. Reconsideration and withdrawal of the rejections set forth in the last Office Action, as they may apply to the claims as set forth, is respectfully requested in view of the remarks set forth herein.

Claims 2-4, 10, 12, 14, and 15 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as their invention. Specifically, the Office Action stated that the "reading step" and the "setting step" lacked antecedent basis. It is customary and clear to refer to a previously recited step, such as "reading one or more security keys into a cache...," in an abbreviated fashion such as the "reading step." Nonetheless, claims 2-3, 10, 12, 14 and 15 are amended to recite "reading one or more security keys into a cache" and "setting the certain security keys" where appropriate. Withdrawal of this rejection is respectfully requested.

The specification and drawings are objected to for certain informalities. These informalities are corrected in the Amendments to the Drawings and the Amendments to the Specifications above. Withdrawal of these objections is respectfully requested.

Claims 6, 7, 9, and 16 are objected to because "it is not clear where the step of 'digitally signing the message with the managed node's public key' is taught in the specification." This feature is supported at least by page 9, lines 30-33, which state:

> The CMS 14 may verify the signed copy of the message by signing the non-signed message with the node's 16 public key and doing a checksum of the public key signed message and the private key signed message.

Withdrawal of this objection is respectfully requested and allowance of these claims is respectfully requested.

Claims 17 to 19 are rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,923,756 to Shambroom ("Shambroom"). "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described,

Amendment to the Drawings:

The attached sheets of drawings include changes to Figures 1 and 4a. In Figure 1, incorrectly labeled element "CMS cluster 17" has been re-labeled "SCM cluster 17." In Figure 4a, reference number 92 has been added to correspond with the description of Figure 4a in the specification.

Attachment: Replacement Sheets
                      Annotated Sheets Showing Changes

in a single prior art reference," <u>Verdegaal Bros. v. Union Oil Co. of California</u>, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987); see also <u>MPEP § 2131</u>. "The identical invention must be shown in as complete detail as is contained in the ... claim." <u>Richardson v. Suzuki Motor Co.</u>, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. <u>In re Bond</u>, 15 USPQ2d 1566 (Fed. Cir. 1990). Applicants respectfully traverse this rejection since Shambroom does not teach each and every element of claims 17 to 19.

For example, Shambroom does not teach "calling, with root as an effective user id, the setKeys method of the authentication class, wherein the root as effective user id enables the reading of root-only readable files including security keys...," as recited in claim 17. Reference to the cited section of Shambroom reveals that it is teaching using password authentication techniques in order to read security keys. Shambroom does not make any reference to effective id or root in the cited section. Consequently, Shambroom does not teach each and every element of claim 17. Therefore, claim 17 is not anticipated and is allowable. Claims 18 and 19, which depend on claim 17, are allowable for at least this same reason and the independent features they recite. Allowance of claims 17-19 is respectfully requested.

Claims 1-5, 8, 10-15, and 20 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Shambroom in view of U.S. Patent No. 6,615,350 to Schell et al. ("Schell"). To establish a *prima facie* case of obviousness ... the prior art reference (or references when combined) must teach or suggest <u>all</u> of the claim features. <u>In re Vaeck</u>, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991) and <u>MPEP § 2142</u>. Shambroom and Schell, alone or combined, do not teach or suggest each and every feature of claims 1-5, 8, 10-15, and 20.

For example, Shambroom does not teach or suggest "reading, with root as an effective user id, one or more security keys into a cache, wherein the root <u>as effective user id</u> enables the reading of <u>root-only readable</u> files including the one or more security keys...," as recited in claims 1 and 13. As discussed above, Shambroom does not make any reference to effective id or root in the cited section. Schell does not cure this defect. Consequently, claims 1 and 13 are not rendered obvious by Shambroom and Schell and are allowable. Therefore, claims 2-5, 8, 10-12, 14, and 15 are allowable for at least these same reasons and the independent features they recite. Allowance of these claims is respectfully requested.

As discussed above, Shambroom does not teach "calling, with root as an effective user id, the setKeys method of the authentication class, wherein the root as effective user id

enables the reading of root-only readable files including security keys...," as recited in claim 17 on which claim 20 depends. Schell does not cure this defect. Therefore, claim 20 is allowable for at least this reason and the independent features it recites. Allowance of this claim is respectfully requested.

New claims 21-23 are allowable at least for the same reasons as recited in claims 1, 13, and 20, and the independent features claims 21-23 recite. For example, the prior art of record does not teach "wherein the reading necessary security keys into the cache with the root enables the retrieving the necessary security keys from the cache using the real user id so long as the Java Virtual Machine is running," as recited in claim 21. Allowance of these claims is respectfully requested.
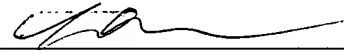
CONCLUSION

In view of the above amendments and remarks, Applicants believe that all of the objections and rejections against this application have been fully addressed and that the application is now in condition for allowance. Therefore, withdrawal of the outstanding objections and rejections and a notice of allowance for the application is respectfully requested.

If the Examiner believes that a personal or telephonic interview would be of value in expediting the prosecution of this application, the Examiner is hereby invited to telephone the undersigned counsel to arrange for such a conference.

Respectfully submitted,

Date: **November 24, 2004**

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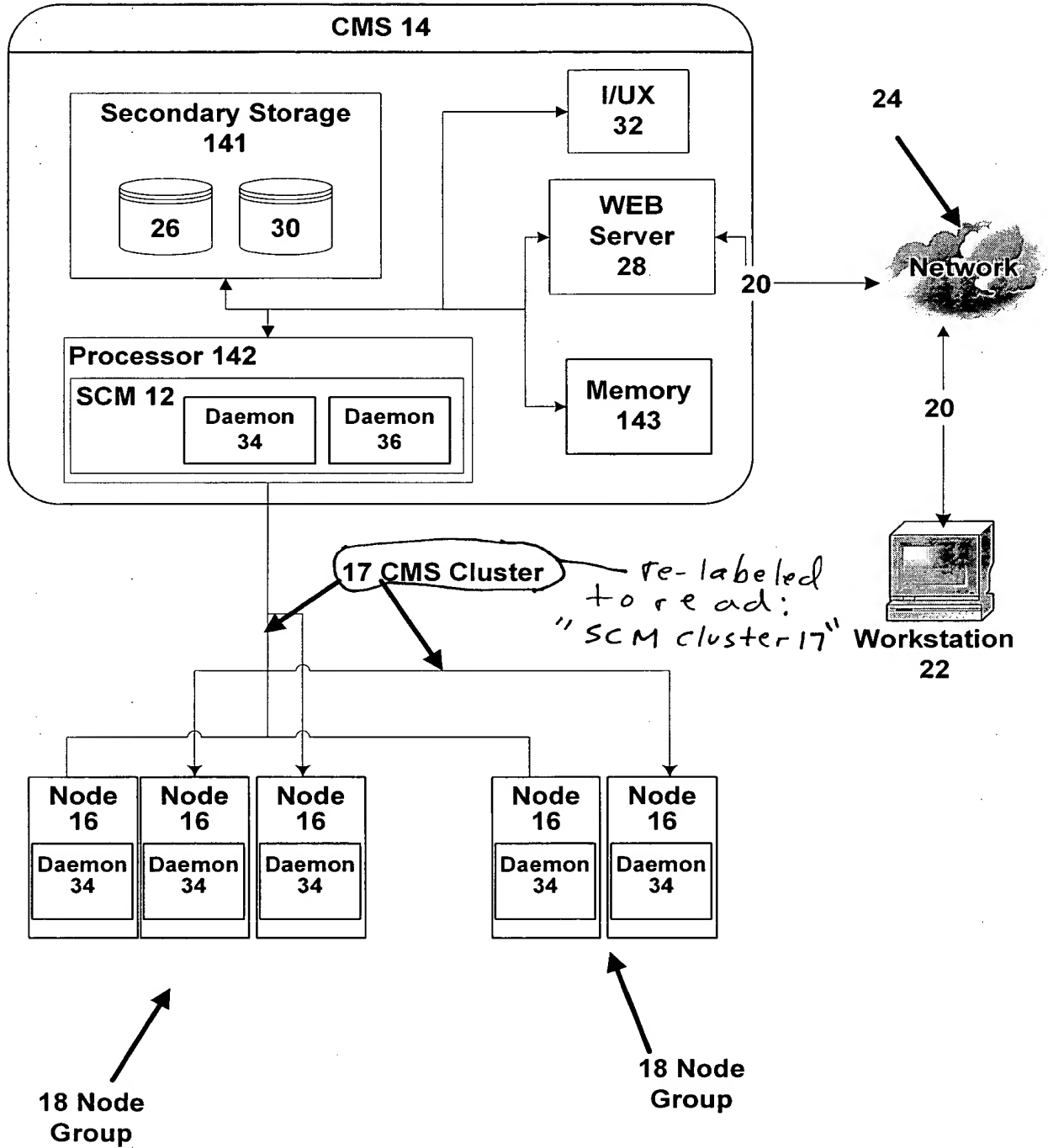Telephone: (202) 662-2738
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Attachments

WAS:108882.1
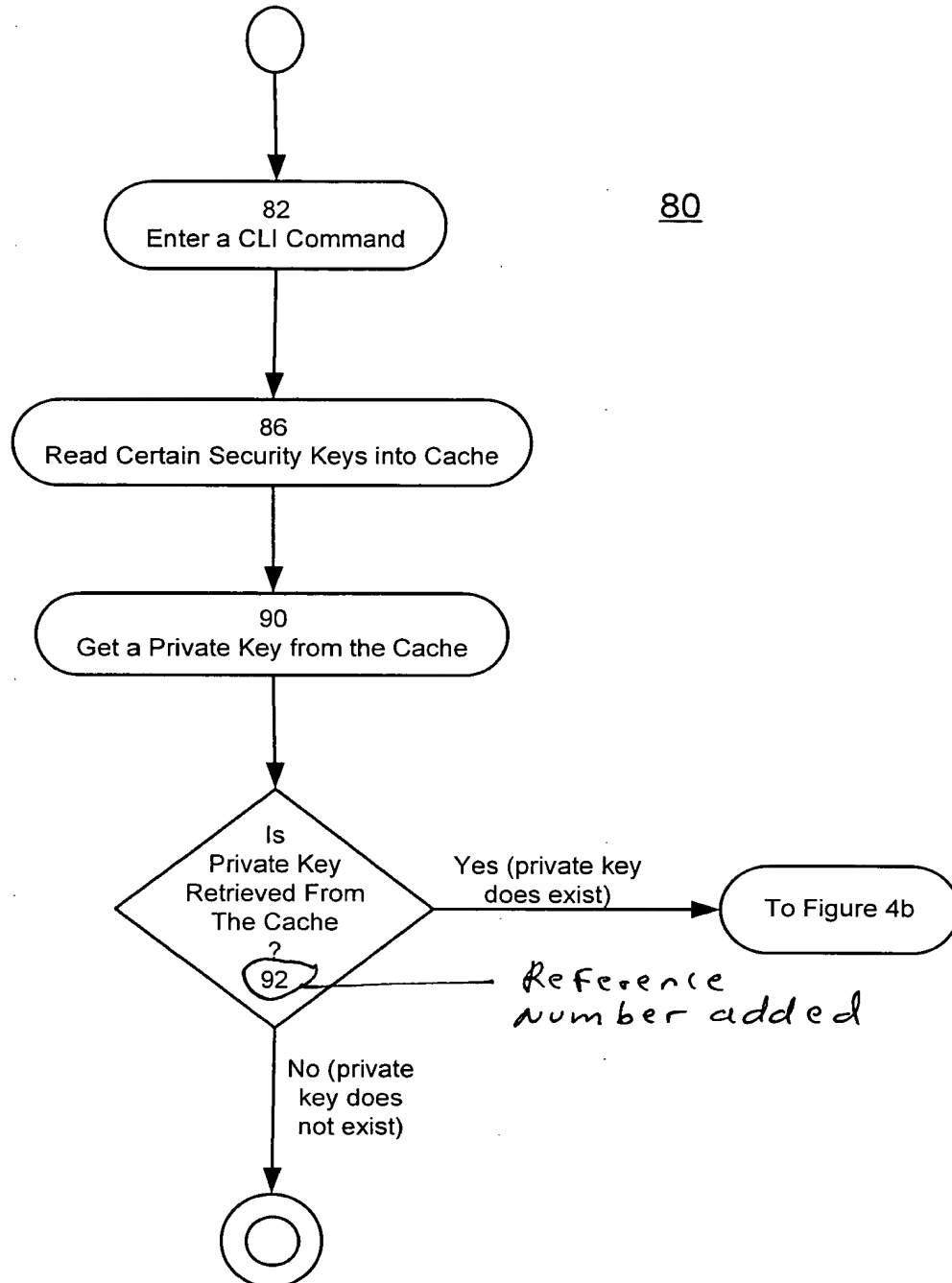
10

CMS 14

Secondary Storage 141

26   30

I/UX
32

WEB
Server
28

20 → Network

24

Processor 142

SCM 12

Daemon
34

Daemon
36

Memory
143

20

Workstation
22

17 CMS Cluster → re-labeled
to read:
"SCM cluster 17"

Node
16

Daemon
34

Node
16

Daemon
34

Node
16

Daemon
34

Node
16

Daemon
34

Node
16

Daemon
34

18 Node
Group

18 Node
Group

FIGURE 1

Figure 4a